

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

KEVIN OMAR MATÍAS-ROSELLÓ,
INDIVIDUALLY AND ON BEHALF OF ALL
OTHERS SIMILARLY SITUATED

Plaintiffs

v.

EPOCH LLC; FOT INVESTMENTS LLC D/B/A
DOMINO'S PIZZA; CLUTCH CONSULTING,
LLC

Defendants

CIVIL NO.: 3:19-cv-01307 (ADC)

FAIR LABOR STANDARDS ACT

JURY TRIAL DEMANDED

**MOTION FOR TEN DAY EXTENSION TO
OPPOSE MOTION FOR SUMMARY JUDGMENT**

TO THE HONORABLE COURT:

COME NOW, Plaintiff KEVIN OMAR MATIAS-ROSELLO, through the undersigned attorneys, and very respectfully states and pray as follows:

1. Defendants filed a motion for summary judgment on May 20, 2021. See docket 37.
2. Plaintiff is completing up its opposition to defendants' Motion, but has had other professional commitments over the last two weeks and still needs to finalize the opposition with his client. The undersigned expects to complete this during the court of next week, and will finalize the opposition shortly thereafter (in all, ten days from now).
3. In light of the above, plaintiff respectfully requests a final extension of ten days, to expire on June 21, 2021, to present its opposition. Plaintiff further submits this extension will not prejudice defendants.

WHEREFORE, plaintiff respectfully requests he be given ten more days, until June 21, 2021, to file his opposition to defendants' motion for summary judgment.

I HEREBY CERTIFY that on this same date a copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to the attorneys of record.

In San Juan Puerto Rico, this 11th of June, 2021.

Respectfully submitted,

COLÓN RAMÍREZ LLC

PO Box 361920

San Juan, PR 00936-1920

Tel: (888)760-1077

Fax: (305) 507-1920

s/Francisco E. Colón-Ramírez

Francisco E. Colón-Ramírez

BAR NO.: 210510

E-mail: fecolon@colonramirez.com

&

KEITH ALTMAN

(admitted pro hac vice)

Excolo Law, PLLC

26700 Lahser Road, Suite 401

Southfield, MI 48033

(516)456-5885

kaltman@excololaw.com